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August 17, 2021

Honorable Alison J. Nathan via ECF  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2102  
New York, NY 10007


Re: Edward Guillen v. City of New York, et al.  
19 Civ. 5655 (AJN) (OTW)

Your Honor:

SO ORDERED.

I am the attorney representing defendants in the above-referenced action. I write to respectfully request an extension of approximately 30 days to submit the defendants' motion for summary judgment from August 23, 2021 to September 24, 2021. Plaintiff's counsel does not consent to this request. Defendants would also further request that the Court adopt the below briefing schedule specifying due dates for plaintiff's opposition and defendants' reply as Your

indicated the date by which the defendants' motion would be extended. I request an extension of time to file defendants' motion for summary judgment and to adopt a briefing schedule. No other dates would be



8/20/21  
SO ORDERED.  
ALISON J. NATHAN, U.S.D.J.

to file their motion for summary judgment for the proposed re-visiting settlement discussions of this case (19 Civ. 11784 before Judge Buchwald) and of discovery in the other docket. If any settlement

discussions are to occur, defendants would prefer to resolve both matters. Second, due to other pressing deadlines after my return from vacation, I have been unable to dedicate as much time as necessary to this motion and therefore respectfully request this extension.

Defendants would propose the following briefing schedule:

- Defendants' motion for summary judgment due by September 24, 2021
- Plaintiff's response in opposition due by October 25, 2021
- Defendants' reply due by November 8, 2021

SO ORDERED.

Thank you for your consideration.

Respectfully submitted,

Soo-Young Shin /s/  
Soo-Young Shin  
*Senior Counsel*

cc: **BY ECF**  
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